

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT
OF COMMERCE, et al.,

Defendants.

CIVIL ACTION NO. 1:18-cv-2921 (JMF)

**SUPPLEMENTAL AFFIDAVIT
OF SUSAN
BROWER**

Pursuant to 28 U.S.C. § 1746(2), I, Susan Brower hereby declare as follows:

1. I make this Supplemental Affidavit in connection with *State of New York, et al., v. United States Department of Commerce, et al.*, in order to provide additional support for the testimony set forth in my prior affidavit sworn to on October 25, 2018 (the “First Brower Aff.”). I am over the age of eighteen and have personal knowledge of all the facts stated herein.

2. In ¶ 5 of the First Brower Aff., I testify that “Residents have already asked questions about the impact of the citizenship question, and I expect those questions to continue. One question residents have asked relates to the confidentiality of survey responses.” In that paragraph, I am referring to questions asked by residents of Minnesota at public outreach events where I was present, and I personally saw and heard those questions being asked.


3. In preparing ¶¶ 6 and 7 of the First Brower Aff., I relied on 2010 Census Redistricting Data, publicly available from the Census Bureau at the following link: https://www2.census.gov/census_2010/01-Redistricting_File--PL_94-171/Minnesota/ (last visited November 2, 2018).

4. In ¶ 9 of the First Brower Aff. I stated that “I was informed by U.S. Census staff

that even if the data was not published to the states in the form of a data file in connection with redistricting, if the Census gathers citizenship data, then it will make that data public on a block level.” The Census Bureau employee who made that statement to me was James Whitehorne, the Chief of the Census Bureau’s Redistricting Data Program.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed on this 3rd day of November,
2018



Susan Brower